

**From:** [Tim Scahill](#)  
**To:** [steve@loevy.com](mailto:steve@loevy.com); [Theresa B. Carney](#)  
**Cc:** [anand@loevy.com](mailto:anand@loevy.com); [Josh M. Engquist](#); [Eileen E. Rosen](#); [David A. Brueggen](#); [Elizabeth R. Fleming](#); [Austin Rahe](#); [Ixsel Zavala](#); [Kara Hutson](#); [Katelyn Salek](#); [Rachel Brady](#); [sean@loevy.com](mailto:sean@loevy.com); [jon@loevy.com](mailto:jon@loevy.com); [Meg Gould](#); [Alyssa Martinez](#); [Emma Logan](#); [Trinity Bias](#); [motter@loevy.com](mailto:motter@loevy.com)  
**Subject:** RE: D. Johnson - Motions in Limine  
**Date:** Thursday, May 15, 2025 12:39:55 PM

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What is the basis for this request? Is there some authority you are relying on for such a limitation? Trying to understand the basis for this motion in general. Are you saying you disagree about admissibility on the “extreme majority” of matters defendants raised but suggesting we should just not raise disputed issues at all because you think there are just too many? Really struggling to understand where you are coming from on this. This sounds like it would be malpractice on our part.

I would also note you provided an initial list of 25 motions despite being a single party, while you count 53 (the number is actually 48) among 4 defendants (3 separately represented) sued for a range of different conduct. So I am not sure why you were “alarmed” by the number we intend to file when your side submitted a far more extensive list per represented party. I would ask that your side perhaps try to focus on not contesting some of these motions as a way to winnow down the briefing you believe this will require. A lot of this should not be controversial given the limitation of issues on summary judgment and in general but that is your call.

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**From:** Steve Art <[Steve@loevy.com](mailto:Steve@loevy.com)>  
**Sent:** Thursday, May 15, 2025 10:50 AM  
**To:** Theresa B. Carney <[tcarney@rfclaw.com](mailto:tcarney@rfclaw.com)>  
**Cc:** Anand Swaminathan <[anand@loevy.com](mailto:anand@loevy.com)>; Josh M. Engquist <[JEngquist@jsotoslaw.com](mailto:JEngquist@jsotoslaw.com)>; Eileen E. Rosen <[ERosen@rfclaw.com](mailto:ERosen@rfclaw.com)>; David A. Brueggen <[DBueggen@jsotoslaw.com](mailto:DBueggen@jsotoslaw.com)>; Elizabeth R. Fleming <[efleming@jsotoslaw.com](mailto:efleming@jsotoslaw.com)>; Austin Rahe <[arahe@rfclaw.com](mailto:arahe@rfclaw.com)>; Ixsel Zavala <[zavala@loevy.com](mailto:zavala@loevy.com)>; Kara Hutson <[khutson@rfclaw.com](mailto:khutson@rfclaw.com)>; Katelyn Salek <[ksalek@jsotoslaw.com](mailto:ksalek@jsotoslaw.com)>; Tim Scahill <[tscahill@borkanscahill.com](mailto:tscahill@borkanscahill.com)>; Rachel Brady <[rachel@loevy.com](mailto:rachel@loevy.com)>; sean@loevy.com; Jon Loevy <[jon@loevy.com](mailto:jon@loevy.com)>; Meg Gould <[gould@loevy.com](mailto:gould@loevy.com)>; Alyssa Martinez <[alyssa@loevy.com](mailto:alyssa@loevy.com)>; Emma Logan <[logan@loevy.com](mailto:logan@loevy.com)>; Trinity Bias <[bias@loevy.com](mailto:bias@loevy.com)>; Marc Motter <[motter@loevy.com](mailto:motter@loevy.com)>  
**Subject:** Re: D. Johnson - Motions in Limine

Dear Counsel,

Plaintiff has reviewed Defendants' proposed list of motions in limine sent last night, which includes 53 proposed motions, the extreme majority of which are contested. We

are alarmed that Defendants intended to file 53 proposed motions, which would amount to more than 500 additional pages of briefing for the Court to consider. We do not think that the Court will appreciate receiving such voluminous pretrial briefs.

Plaintiff intends to file a motion today asking the Court to limit each side to 10 motions in limine, unless the parties reach agreement to impose that limit voluntarily. That will mean each side cut a significant number of motions. Please let us know your position prior to our scheduled 2 p.m. call so we can get the motion on file.

Thank you, as always, for your cooperation in this matter.

Sincerely,

Steve

---

**Steve Art** (He/Him)



Office: (312) 243-5900 / Direct: (312) 789-4965

On Wed, May 14, 2025 at 10:03 PM Theresa B. Carney <[tcarney@rfclaw.com](mailto:tcarney@rfclaw.com)> wrote:

Steve/Anand – Attached is the list of the Defendants’ Motions in ***Limine***.

We will circulate a call in number for us to talk tomorrow (May 15) at 2:00.

Thank you,  
Theresa

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**From:** Anand Swaminathan <[anand@loevy.com](mailto:anand@loevy.com)>

**Date:** Wednesday, May 14, 2025 at 8:24 PM

**To:** Josh M. Engquist <[JEngquist@jsotoslaw.com](mailto:JEngquist@jsotoslaw.com)>

**Cc:** [steve@loevy.com](mailto:steve@loevy.com) <[steve@loevy.com](mailto:steve@loevy.com)>, Eileen E. Rosen <[ERosen@rfclaw.com](mailto:ERosen@rfclaw.com)>, Theresa B. Carney <[tcarney@rfclaw.com](mailto:tcarney@rfclaw.com)>, David A. Brueggen <[DBrueggen@jsotoslaw.com](mailto:DBrueggen@jsotoslaw.com)>, Elizabeth R. Fleming <[efleming@jsotoslaw.com](mailto:efleming@jsotoslaw.com)>, Austin Rahe <[arahe@rfclaw.com](mailto:arahe@rfclaw.com)>, Ixsel Zavala <[zavala@loevy.com](mailto:zavala@loevy.com)>, Izeta Causevic <[icausevic@rfclaw.com](mailto:icausevic@rfclaw.com)>, Kara Hutson <[khutson@rfclaw.com](mailto:khutson@rfclaw.com)>, Katelyn Salek <[ksalek@jsotoslaw.com](mailto:ksalek@jsotoslaw.com)>, [tscahill@borkanscahill.com](mailto:tscahill@borkanscahill.com) <[tscahill@borkanscahill.com](mailto:tscahill@borkanscahill.com)>, Rachel Brady <[rachel@loevy.com](mailto:rachel@loevy.com)>, [sean@loevy.com](mailto:sean@loevy.com) <[sean@loevy.com](mailto:sean@loevy.com)>

**Subject:** Re: D. Johnson - Motions in Limine

Yes, we are. We anticipate sending you list within next hour. Thanks.

On Wed, May 14, 2025 at 8:23 PM Josh M. Engquist <[JEngquist@jsotoslaw.com](mailto:JEngquist@jsotoslaw.com)> wrote:

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**[The Sotos Law, P.C.]**

Steve-

Are you planning on exchanging lists of MILs and meeting tomorrow at 2 to discuss?  
We have not heard back from you.

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**From:** Josh M. Engquist <[JEngquist@jsotoslaw.com](mailto:JEngquist@jsotoslaw.com)>

**Sent:** Wednesday, May 14, 2025 8:07 AM

**To:** [steve@loevy.com](mailto:steve@loevy.com) <[steve@loevy.com](mailto:steve@loevy.com)>

**Cc:** [anand@loevy.com](mailto:anand@loevy.com) <[anand@loevy.com](mailto:anand@loevy.com)>; Eileen E. Rosen <[erosen@rfclaw.com](mailto:erosen@rfclaw.com)>; Theresa B. Carney <[tcarney@rfclaw.com](mailto:tcarney@rfclaw.com)>; David A. Brueggen <[DBrueggen@jsotoslaw.com](mailto:DBrueggen@jsotoslaw.com)>; Elizabeth R. Fleming <[efleming@jsotoslaw.com](mailto:efleming@jsotoslaw.com)>; Austin Rahe <[arahe@rfclaw.com](mailto:arahe@rfclaw.com)>; Ixsel Zavala <[zavala@loevy.com](mailto:zavala@loevy.com)>; Izeta Causevic <[icausevic@rfclaw.com](mailto:icausevic@rfclaw.com)>; Kara Hutson <[khutson@rfclaw.com](mailto:khutson@rfclaw.com)>; Katelyn Salek <[ksalek@jsotoslaw.com](mailto:ksalek@jsotoslaw.com)>; [tscahill@borkanscahill.com](mailto:tscahill@borkanscahill.com) <[tscahill@borkanscahill.com](mailto:tscahill@borkanscahill.com)>; Rachel Brady <[rachel@loevy.com](mailto:rachel@loevy.com)>; [sean@loevy.com](mailto:sean@loevy.com) <[sean@loevy.com](mailto:sean@loevy.com)>

**Subject:** Re: D. Johnson - Motions in Limine

Steve-

Sorry, currently out of state, but yes we can exchange lists of motions today and confer tomorrow at 2.

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**From:** Steve Art <[Steve@loevy.com](mailto:Steve@loevy.com)>

**Sent:** Monday, May 12, 2025 7:05:49 PM

**To:** Josh M. Engquist <[JEngquist@jsotoslaw.com](mailto:JEngquist@jsotoslaw.com)>

**Cc:** [anand@loevy.com](mailto:anand@loevy.com) <[anand@loevy.com](mailto:anand@loevy.com)>; Eileen E. Rosen <[erosen@rfclaw.com](mailto:erosen@rfclaw.com)>; Theresa B.

Carney <[tcarney@rfclaw.com](mailto:tcarney@rfclaw.com)>; David A. Brueggen <[DBrueggen@jsotoslaw.com](mailto:DBrueggen@jsotoslaw.com)>; Elizabeth R. Fleming <[efleming@jsotoslaw.com](mailto:efleming@jsotoslaw.com)>; Austin Rahe <[arahe@rfclaw.com](mailto:arahe@rfclaw.com)>; Hershey Suri <[suri@loevy.com](mailto:suri@loevy.com)>; Ixsel Zavala <[zavala@loevy.com](mailto:zavala@loevy.com)>; Izeta Causevic <[icausevic@rfclaw.com](mailto:icausevic@rfclaw.com)>; Kara Hutson <[khutson@rfclaw.com](mailto:khutson@rfclaw.com)>; Katelyn Salek <[ksalek@jsotoslaw.com](mailto:ksalek@jsotoslaw.com)>; [tscahill@borkanscahill.com](mailto:tscahill@borkanscahill.com) <[tscahill@borkanscahill.com](mailto:tscahill@borkanscahill.com)>; Rachel Brady <[rachel@loevy.com](mailto:rachel@loevy.com)>; [sean@loevy.com](mailto:sean@loevy.com) <[sean@loevy.com](mailto:sean@loevy.com)>

**Subject:** Re: D. Johnson - Motions in Limine

Keep us posted.

Steve

---

**Steve Art** (He/Him)

Office: (312) 243-5900 / Direct: (312) 789-4965

On Mon, May 12, 2025 at 5:23 PM Josh M. Engquist <[JEngquist@jsotoslaw.com](mailto:JEngquist@jsotoslaw.com)> wrote:

I think that timing should work, but I am trying to get confirmation from all the defendants.

Sincerely,

Josh Engquist

The Sotos Law Firm, P.C.

141 W. Jackson Blvd. #1240A

Chicago, IL 60604

(630)735-3303(Direct)

(630) 773-0980 (Fax)

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**From:** Steve Art <[Steve@loevy.com](mailto:Steve@loevy.com)>

**Sent:** Monday, May 12, 2025 4:09 PM

**To:** Josh M. Engquist <[JEngquist@jsotoslaw.com](mailto:JEngquist@jsotoslaw.com)>

**Cc:** [anand@loevy.com](mailto:anand@loevy.com); Eileen E. Rosen <[erosen@rfclaw.com](mailto:erosen@rfclaw.com)>; Theresa B. Carney <[tcarney@rfclaw.com](mailto:tcarney@rfclaw.com)>; David A. Brueggen <[DBrueggen@jsotoslaw.com](mailto:DBrueggen@jsotoslaw.com)>; Elizabeth R. Fleming <[efleming@jsotoslaw.com](mailto:efleming@jsotoslaw.com)>; Austin Rahe <[arahe@rfclaw.com](mailto:arahe@rfclaw.com)>; Hershey Suri <[suri@loevy.com](mailto:suri@loevy.com)>; Ixsel Zavala <[zavala@loevy.com](mailto:zavala@loevy.com)>; Izeta Causevic <[icausevic@rfclaw.com](mailto:icausevic@rfclaw.com)>; Kara Hutson <[khutson@rfclaw.com](mailto:khutson@rfclaw.com)>; Katelyn Salek <[ksalek@jsotoslaw.com](mailto:ksalek@jsotoslaw.com)>; [tscahill@borkanscahill.com](mailto:tscahill@borkanscahill.com); Rachel Brady <[rachel@loevy.com](mailto:rachel@loevy.com)>; [sean@loevy.com](mailto:sean@loevy.com)

**Subject:** Re: D. Johnson - Motions in Limine

How about lists exchanged Wednesday and conference Thursday? I imagine where there's room for agreement we'll be able to reach agreement pretty quickly and we'll be able to predict the ones that are opposed.

Steve

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**Steve Art** (He/Him)

Office: (312) 243-5900 / Direct: (312) 789-4965

On Mon, May 12, 2025 at 4:07 PM Josh M. Engquist <[JEngquist@jsotoslaw.com](mailto:JEngquist@jsotoslaw.com)> wrote:

The way I understand the order is all motions in limine.

Sincerely,

Josh Engquist

The Sotos Law Firm, P.C.

[141 W. Jackson Blvd. #1240A](#)

[Chicago, IL 60604](#)

(630)735-3303(Direct)

(630) 773-0980 (Fax)

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**From:** Steve Art <[Steve@loevy.com](mailto:Steve@loevy.com)>

**Sent:** Monday, May 12, 2025 4:00 PM

**To:** Josh M. Engquist <[JEngquist@jsotoslaw.com](mailto:JEngquist@jsotoslaw.com)>

**Cc:** [anand@loevy.com](mailto:anand@loevy.com); Eileen E. Rosen <[erosen@rfclaw.com](mailto:erosen@rfclaw.com)>; Theresa B. Carney <[tcarney@rfclaw.com](mailto:tcarney@rfclaw.com)>; David A. Brueggen <[DBrueggen@jsotoslaw.com](mailto:DBrueggen@jsotoslaw.com)>; Elizabeth R. Fleming <[efleming@jsotoslaw.com](mailto:efleming@jsotoslaw.com)>; Austin Rahe <[arahe@rfclaw.com](mailto:arahe@rfclaw.com)>; Hershey Suri <[suri@loevy.com](mailto:suri@loevy.com)>; Ixsel Zavala <[zavala@loevy.com](mailto:zavala@loevy.com)>; Izeta Causevic <[icausevic@rfclaw.com](mailto:icausevic@rfclaw.com)>; Kara Hutson <[khutson@rfclaw.com](mailto:khutson@rfclaw.com)>; Katelyn Salek <[ksalek@jsotoslaw.com](mailto:ksalek@jsotoslaw.com)>; [tscahill@borkanscahill.com](mailto:tscahill@borkanscahill.com); Rachel Brady <[rachel@loevy.com](mailto:rachel@loevy.com)>; [sean@loevy.com](mailto:sean@loevy.com)

**Subject:** Re: D. Johnson - Motions in Limine

Hi Josh,

Are we supposed to discuss all anticipated motions or just those we think we might reach agreement on? Let us know your thoughts. Thanks,

Steve

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**Steve Art** (He/Him)

Office: (312) 243-5900 / Direct: (312) 789-4965

On Mon, May 12, 2025 at 2:15 PM Josh M. Engquist <[JEngquist@jsotoslaw.com](mailto:JEngquist@jsotoslaw.com)> wrote:

Counsel:

As you are aware, motions in limine are due to the court this Friday.

When would you like to exchange lists of potential motions in limine and schedule a time to discuss (pursuant to her standing order)?

Sincerely,

Josh Engquist

The Sotos Law Firm, P.C.

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[Chicago, IL 60604](#)

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(630) 773-0980 (Fax)

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